

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Mark J. Stephenson, being sworn, state:

Introduction and Agent Background

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") and assigned to the Boston Division since 2017. More specifically, I am assigned to the FBI Boston Violent Crimes Task Force ("VCTF"). As a Special Agent with the FBI, I have conducted numerous investigations dealing with bank and commercial robberies and burglaries, assaults, larcenies, extortion, firearms violations, gangs, narcotics, and crimes against persons. I have also received specialized training regarding investigative techniques, evidence collection, and evidence preservation.

2. I am aware that Title 18, United States Code, Section 2113(a) and (d) make it a crime for anyone to use force and violence, or intimidation, to take money belonging to or in the care, custody, control, management, or possession of any federally-insured financial institution, and in committing such offense to assault or put in jeopardy the life of any person by the use of a dangerous weapon.

3. I make this affidavit in support of a criminal complaint charging David J. Hattersly ("Hattersly"), DOB: XX/XX/1974, with the armed robbery of a branch of the Bank of America, located at

25 American Legion Highway in Revere, Massachusetts on August 19, 2019. On the date of the robbery, the Bank of America was insured by the Federal Deposit Insurance Corporation. The facts stated herein are based on my own personal involvement with this investigation, as well as from information provided to me by other law enforcement officers involved in the investigation. In submitting this affidavit, I have not included each and every fact known to me about this investigation; rather, I am only submitting enough evidence necessary to establish the requisite probable cause.

BANK OF AMERICA August 19, 2019

4. On August 19, 2019, at approximately 1:25 p.m., a white male entered a branch of the Bank of America entrance, located at 25 American Legion Highway, Revere, Massachusetts. The individual approached a teller window, presented a demand for the bank's money, brandished what appeared to be a black semi-automatic handgun, and pointed the handgun directly at the teller. The demand note, which was later recovered by law enforcement read, "THIS IS A ROBBERY, I HAVE A GUN. THE QUICKER YOU COMPLY NOBODY GETS HURT. HAND ME ALL THE 100'S, 50'S 20'S OUT OF YOUR DRAWER. NO DYE PACKS THE FBI WILL SORT IT OUT LATER DONT BE A HERO BECAUSE I WILL KILL SOMEBODY. IF I HAVE TO !!! & THE BLOOD WILL BE ON YOUR HANDS." The teller removed currency

from his cash drawer, handed it to the individual ("the robber") and the robber exited the bank.

5. The teller who interacted with the robber described the robber as a white male, 6' in height, wearing a white tank top and in possession of a black gun. The teller also stated that the robber had tattoos on both his arms, chest and back.

6. Bank surveillance cameras were functioning and operating on the date of the robbery. The cameras captured images of the robber as he entered the bank, interacted with the teller, and then exited the bank.

7. A post-robbery audit determined that the robber had taken \$13,100.00 in U.S. currency during the robbery.

ARREST OF HATTERSLY

8. Within moments of the robbery, the Revere Police Department arrived at the bank, spoke to the teller who had interacted with the robber, and obtained a description of the robber. The Revere Police also learned that the robber fled the robbery scene on a Massachusetts Bay Transportation Authority bus.

9. The Revere Police located the bus driver and she (the bus driver) stated, in substance, that a person, fitting the description of the robber, entered the bus on Beach Street in Revere and attempted to pay the driver with a \$100 bill. The bus driver then stated that this individual then offered the bus driver \$500 if she, the bus driver, would drive the individual

to Dorchester. The bus driver stated that the individual exited the bus in the vicinity of Broadway and Yeamans Streets in Revere.

10. A short time later, the Revere Police Department received a call from an individual ("the homeowner") who was located at a residential address in Revere. This residential address is approximately .4 mile from the area where the bus had dropped the individual off. The homeowner stated that her children were playing in the yard of her property when an individual, later identified as the robber, entered the property's back yard. The homeowner went out to the yard and confronted the robber. The homeowner stated that she observed the robber holding a large sum of cash and what appeared to be a black handgun. The homeowner stated that the robber said in substance, he had just robbed a bank and he needed a ride to Dorchester. The homeowner then entered her residence, called the police, and returned to the backyard and observed the robber counting the large sum of cash.

11. Revere Police Department responded to the call of a suspicious person, matching the description of the robber, located at the residential yard mentioned in Paragraph 10. Upon arrival at the address, Revere Police Department Officers observed an individual, later identified as Hattersley, sitting on the grass in the yard with a large sum of US currency.

Officers also observed what appeared to be a black semi-automatic handgun on the ground next to Hattersley. Hattersley was placed into custody and transported to the Revere Police Department.

12. Revere Police later recovered the black semi-automatic handgun (later determined to be a BB gun) and \$6,100.00 from the backyard. During the booking process at Revere Police Department, \$6,300.00 was recovered from Hattersley's person.

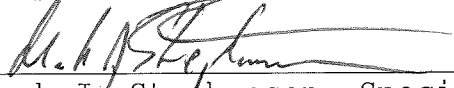
13. I have reviewed the bank's surveillance cameras' footage and have reviewed the booking photographs taken of Hattersley at the Revere Police Station during booking. The individual depicted in the banks' surveillance footage and the individual in the booking photographs is the same person. In both sets of photographs, the individual is a white male, 6' in height, wearing a white tank top, with heavily tattooed arms, chest and back.

CONCLUSION


14. Based on the foregoing, I submit there is probable cause to believe that on August 19, 2019, David J. Hattersly, by force and violence, and by intimidation took from the person and presence of another, money in the care, custody, control, management and possession of the Bank of America, a bank insured by the Federal Deposit Insurance Corporation, and in committing such offense did assault and put into jeopardy the life of

another by the use of a dangerous weapon, that is a BB gun, in violation of 18 U.S.C. §§ 2113(a) and (d).

Respectfully submitted,


Mark J. Stephenson, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 26th day of September 2019.


HONORABLE MARIANNE E. BOWLER
United States Magistrate Judge

